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Attorney for Defendant  
KATHERINE P. KEALOHA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KATHERINE P. KEALOHA (1),  
LOUIS M. KEALOHA (2),  
DEREK WAYNE HAHN (3),  
MINH-HUNG NGUYEN (4),  
GORDON SHIRAISHI (5), and  
DANIEL SELLERS (6),

Defendants.

CR NO. 17-00582-JMS-WRP

DEFENDANTS KATHERINE P.  
KEALOHA'S SECOND  
AMENDMENT TO PROPOSED  
JURY INSTRUCTIONS; EXHIBIT  
"A"; CERTIFICATE OF SERVICE

**DEFENDANTS KATHERINE P. KEALOHA'S SECOND AMENDMENT  
TO PROPOSED JURY INSTRUCTIONS**

Defendant KATHERINE P. KEALOHA ("Ms. Kealoha"), by and through her counsel Cynthia A. Kagiwada, Esq., respectfully submits a second amendment to her previously submitted June 11, 2019 proposed jury instructions [ECF No.718] ("Kealoha Proposed Instructions").

Based on earlier discussions with the Court and the parties at the June 21, 2019 morning status conference on jury instructions, Ms. Kealoha submits her amended Proposed Instruction No. 13 regarding the jury's consideration of other alleged acts committed by Ms. Kealoha that are not charged in the Indictment. Ms. Kealoha's amended Proposed Instruction No. 13 is attached as **Exhibit "A"**.

DATED: Kaneohe, Hawaii, June 21, 2019.

Respectfully submitted,

/s/ Cynthia A. Kagiwada  
CYNTHIA A. KAGIWADA  
Attorney for Defendant  
KATHERINE P. KEALOHA

# EXHIBIT “A”

**KEALOHAS' [AMENDED] PROPOSED INSTRUCTION NO. 13**

You have heard evidence that Defendant Katherine P. Kealoha (“Ms. Kealoha”) allegedly committed other acts related to a reverse mortgage involving Florence Puana, a condominium purchase for Gerard Puana, and Ms. Kealoha’s use of a notary public name identified as Alison Lee Wong. These acts are not charged here. You may consider this evidence only for its bearing, if any, on the question of Ms. Kealoha’s motive and for no other purpose. You may not consider this evidence as evidence of guilt of the crimes for which Ms. Kealoha is now on trial.

**Ninth Circuit Manual of Model Criminal Jury Instruction No. 4.3 (2019).**

